

RONALD S. BUSHNER (SBN: 98352)
 MEGAN M. LEWIS (SBN: 246052)
**WILSON, ELSE, MOSKOWITZ,
 EDELMAN & DICKER LLP**

525 Market Street – 17th Floor
 San Francisco, California 94105-2725
 Telephone: (415) 433-0990
 Facsimile: (415) 434-1370

Attorneys for Counter-Claim Defendant
 NATIONAL SEATING & MOBILITY, INC.

MARK P. MEUSER (SBN: 231335)
MEUSER LAW GROUP, INC

PO Box 5412
 Walnut Creek, CA 94596
 Telephone: (415) 577-2850
 Facsimile: (925) 262-4656
 mark@meuser-law.com

Attorney for Counter-Claimant MICHAEL PARRY
 and for all other similarly situated, counter-claimants

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

NATIONAL SEATING & MOBILITY, INC.,

Plaintiff,

vs.

MICHAEL PARRY and DOES 1 through 20;
 inclusive,

Defendants.

MICHAEL PARRY, individually and on behalf
 of all others similarly situated,

Counter-Claimant,

vs.

NATIONAL SEATING & MOBILITY, INC.,

Counter-Claim Defendant.

Case No. 3:10-cv-02782-JSW

**COUNTER-CLAIM DEFENDANT
 NSM'S AND COUNTER-CLAIMANT
 MICHAEL PARRY'S STIPULATION
 TO CONTINUE NSM'S DEADLINE
 TO OPPOSE PARRY'S MOTION FOR
 CLASS CERTIFICATION and
~~PROPOSED ORDER~~**

Action Filed: March 3, 2010

STIPULATION RE CLASS CERTIFICATION OPPOSITION DEADLINE AND ~~PROPOSED ORDER~~

Pursuant to the Court's Order Vacating Case Management Conference and Setting Case Management Deadlines, dated October 4, 2010, NSM's deadline to file its opposition to Parry's Motion for Class Certification is currently August 5, 2011. Due to unavailability of a critical declarant, NSM has been unable to finalize its opposition and supporting documents. *See* Declaration of Ronald S. Bushner (hereinafter "Bushner Decl."), filed concurrently herewith, at ¶ 3.

As such, the parties request that the Court allow NSM to its opposition to Parry's Motion for Class Certification on or before August 9, 2011. The Court previously granted Parry a short extension of time to file his Motion for Class Certification. *See* Bushner Decl. at ¶ 4. The other deadlines established in the Court's October 4, 2010 Order, including Mr. Parry's deadline to reply to NSM's opposition (August 26, 2011) and the scheduled date for the hearing on Mr. Parry's class certification motion (September 16, 2011), will remain unchanged as to minimize any inconvenience to the Court.

Dated: August 4, 2011

Respectfully submitted,
WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER, LLP

By: /s/
 Ronald S. Bushner
 Megan M. Lewis
*Attorneys for Plaintiff/Counter-claim
 Defendant*

Dated: August 4, 2011

Respectfully submitted,
MEUSER LAW GROUP, INC.

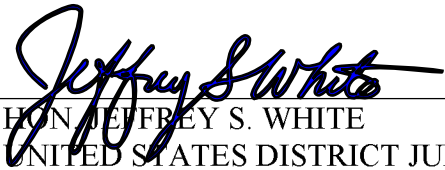
By: /s/
Mark P. Meuser
Attorneys for Defendant/Counter-claimant

~~PROPOSED~~ ORDER

Good cause appearing therefore, the Stipulation and Proposed Order is hereby adopted by the Court. Counter-Claim Defendant NSM's opposition to Parry's Motion for Class Certification must be filed on or before August 9, 2011. The other dates specified in the Court's October 4, 2010 Order have not changed.

IT IS SO ORDERED.

Dated: August 5, 2011

By: 
HON. JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE